

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**AMAZON.COM, INC and AMAZON  
DATA SERVICES, INC.,**

Plaintiffs,

v.

**WDC HOLDINGS LLC d/b/a  
NORTHSTAR COMMERCIAL  
PARTNERS, et al.,**

Defendants,

**Case No. 1:20cv484**

**Hon. Rossie D. Alston, Jr.  
Hon. Ivan D. Davis**

**MOTION TO FILE DOCUMENTS  
UNDER SEAL**

**800 HOYT LLC,**

Intervening Interpleader Plaintiff,

v.

**BRIAN WATSON, et al.,**

Interpleader Defendants.

Pursuant to Local Rule 5(C) and Section 11.e of the June 4, 2020 Protective Order entered in this case (Doc. 55), Defendant Carleton Nelson files this Motion to file an unreacted version of his brief in support of his motion to compel discovery concerning request for production number 4 and exhibits A, B, C, H, I, and N to the Declaration of Adam R. Smart in support of that motion, under seal. Nelson files this motion because Plaintiffs have designated certain materials in the brief as confidential as well as having designated the exhibits hereto as confidential or highly

confidential, and Exhibits A, B and N are portions of depositions that may incorporate such materials. The Nelson defendants will also file a redacted version of the brief on the public ECF.

**Description of Documents**

- Exhibit A is a true and correct copy of excerpts from the 30(b)(6) deposition of Amazon, by corporate representative Chris Vonderhaar, taken on September 14, 2022 in this action.
- Exhibit B is a true and correct copy of excerpts from the deposition of Richard Lee, taken on December 19, 2022 in this action.
- Exhibit C is a true and correct copy of excerpts from the report of Richard Lee, disclosed by Amazon in this action.
- Exhibit H is a true and correct copy of a spreadsheet produced by Amazon in discovery in this action that appears to be a list of the developers to whom it sent the requests for certifications at issue in this motion.
- Exhibit I is a true and correct copy of correspondence from Amazon to developer Steuart-Westfax A, LLC produced by Amazon in discovery in this action.
- Exhibit N is a true and correct copy of excerpts from the deposition of Keith Klein, taken on March 22, 2022 in this action.

Pursuant to Local Rule 5, because Plaintiffs have designated the material confidential, Plaintiffs must file a response to the motion complying with requirements of Local Rule 5 and submit a proposed order.

WHEREFORE, Nelson requests that the Court enter an Order allowing the foregoing referenced brief and exhibits to the declaration of Adam R. Smart be filed under seal.

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December 23, 2022

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/s/ Rachel Friedman

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2022, a true and correct copy of the foregoing has been served upon all parties of record via the ECF system and via email.

Dated: December 23, 2022

/s/ Rachel Friedman

Rachel Friedman